

EXHIBIT O

**UNITED STATES DISTRICT COURT
DISTRICT OF MARYLAND**

JACK BOOTHE, Individually and on Behalf
of All Others Similarly Situated,

Plaintiff,

v.

NORTHSTAR REALTY FINANCE CORP.,
INC., *et al.*,

Defendants.

Case No.: 1:16-cv-03742-JKB

**DECLARATION OF THOMAS L. LAUGHLIN, IV IN SUPPORT OF
REPLY MEMORANDUM IN SUPPORT OF MOTION TO INTERVENE AND
FOR RELIEF FROM FINAL ORDER AND JUDGMENT**

I, Thomas L. Laughlin, IV, pursuant to 28 U.S.C. §1746, hereby declare as follows:

1. I am an attorney duly licensed to practice in the State of New York. I am a partner with the law firm Scott+Scott Attorneys at Law LLP (“Scott+Scott”), counsel for Intervenor Michael Bumgardner, William Pennington, John Wood, and Marjorie Wood (“Intervenors”) in this action. I submit this declaration in support of the Intervenor’s Reply Memorandum in Support of Motion to Intervene and for Relief from Final Order and Judgment, which is filed concurrently herewith. I have personal knowledge of the matters stated herein and, if called upon, I could and would competently testify thereto.

2. On or about June 29, 2018, I began telephonic communications with Lawrence B. Dvoves (“Dvoves”), who had filed an appeal of the Final Order and Judgment in the instant case with the United States Court of Appeals for the Fourth Circuit, under docket number 18-1001, and whose appeal was pending. Dvoves was representing himself *pro se* in the appeal.

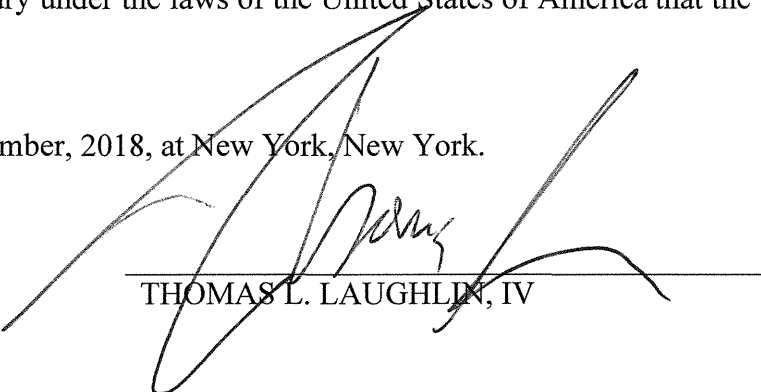
3. Consistent with Scott+Scott's obligations under the Federal Rules of Appellate Procedure, I explained to Dvores that my clients had an interest in his appeal because they had filed a state court case in California that was potentially barred by the Final Order and Judgment in the instant case. I asked Dvores if he would consent to my firm's filing of an *amici* brief in the appeal, along with Robbins Arroyo LLP ("Robbins Arroyo").

4. Dvores was enthusiastic about the assistance of counsel in his appeal and gave his consent to file the *amici* brief.

5. Subsequently, on July 27, 2018, Scott+Scott and Robbins Arroyo did file an *amici* brief in support of Dvores and in opposition to Plaintiff-Appellee's motion to dismiss for lack of jurisdiction. As stated in the brief, the motion to dismiss filed by Plaintiff-Appellee lacked legal merit.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 18th day of December, 2018, at New York, New York.



THOMAS L. LAUGHLIN, IV